

INITIAL CONFERENCE QUESTIONNAIRE

1. Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page): August 31, 2020
2. Deadline for first request for production of documents and first request for interrogatories: October 1, 2020
- 2(a). Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules for: Crossclaim-Plaintiff plaintiff(s) 15 ; Crossclaim-Defendants defendant(s) 15
3. Date for completion of any joinder of additional parties and amendment of the pleadings: November 13, 2020
- 3(a). Number of proposed additional parties to be joined, if any, by: plaintiff(s) ____ ; defendant(s) ____
4. Number of depositions by Crossclaim-Plaintiff plaintiff(s) of: parties 8 ; non-parties 8
5. Number of depositions by Crossclaim-Defendants defendant(s) of: parties 8 ; non-parties 8
6. Date of status conference (joint status report due two business days in advance): December 1, 2020
7. Date for completion of factual discovery: June 1, 2021
8. Are expert witnesses needed? Yes ☒ No ____
- 8(a). Number of expert witnesses, if any, of Crossclaim-Plaintiff plaintiff(s): medical ____ ; non-medical 1
- 8(b). Date for completion of those expert reports: July 16, 2021
- 8(c). Number of expert witnesses, if any, of Crossclaim-Defendants defendant(s): medical ____ ; non-medical 1
- 8(d). Date for completion of those expert reports: July 16, 2021
9. Date for completion of expert discovery: September 1, 2021
10. Date of pretrial conference (brief *ex parte* statements of settlement position due via email two business days in advance): _____
11. Types of contemplated dispositive motions by plaintiff(s) and dates for filing of those motions: Summary Judgment
Crossclaim-Plaintiff October 15, 2021

12. Types of contemplated dispositive motions by ~~defendant(s)~~ and dates for filing of those motions:
Crossclaim-Defendants

Summary Judgment

October 15, 2021

13. Have counsel reached any agreements regarding electronic discovery? (If so, please describe at the initial conference.)
14. Have counsel reached any agreements for disclosure of experts' work papers (including drafts) and communications with experts? (If so, please describe on a separate page.)
15. Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (If any party declines to consent, answer no but do not indicate which party declined.)

Yes ____ No ✓

Yes ____ No ✓

Yes ____ No ✓